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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
 TELEPHONY CONSULTANTS, MRZ
 MANAGEMENT, LLC, DONOR
 RELATIONS, LLC, TPFE, INC., AMERICAN
 TECHNOLOGY SERVICES, COMPLIANCE
 CONSULTANTS, CHROME BUILDERS
 CONSTRUCTION, INC., and UNIFIED
 DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and
 JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINE FOR
PLAINTIFFS' SECOND MOTION TO
COMPEL DISCOVERY AND FOR
SANCTIONS TO JUNE 4, 2021**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiffs Richard Zeitlin; Advanced Telephony
 Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American Technology
 Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified Data
 Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and through their
 respective undersigned counsel of record, submit this Stipulation and Proposed Order for a 16-
 day extension of BANA's deadline to file its response to Plaintiffs' Second Motion to Compel
 Discovery and For Sanctions (ECF No. 104) (the "Motion") from May 19, 2021, BANA's current

1 deadline to respond pursuant to Local Rule 7-2(b), to June 4, 2021. Plaintiffs' Motion was filed,
2 along with a Motion to Seal, on May 5, 2021. [ECF Nos. 102, 104.]

3 This is the Parties' first request for an extension of BANA's time to file its response to the
4 Motion and is not intended to cause any delay or prejudice to any party. The reason for the
5 extension is to give BANA time to evaluate and respond to the arguments set forth in the Motion.

6 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
7 for BANA to file its response to the Motion is extended to and through June 4, 2021.

8 **IT IS SO STIPULATED.**

9 Dated: May 6, 2021

Dated: May 6, 2021

10 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

11 /s/ Daniel James Treuden

/s/ Holly E. Cheong

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27 *Attorneys for Plaintiffs*

28 **IT IS SO ORDERED.**


UNITED STATES MAGISTRATE JUDGE

DATED: May 7, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND RESPONSE DEADLINE FOR PLAINTIFFS' SECOND MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS TO JUNE 4, 2021 (FIRST REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: May 6, 2021

/s/Gaylene Kim-Mistrille
An Employee of Snell & Wilmer L.L.P.

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